

EXHIBIT A

Mallory Benner

From: Ronald Giller
Sent: Monday, May 19, 2025 9:15 AM
To: Bernie Kleinman
Cc: Mallory Benner
Subject: RE: Clearview v Johnson

Bernie,

It is evident from your email that you and your client have not complied with the Court's numerous orders requiring him to provide outstanding discovery by deadlines that have now passed and have no intention of complying. Moreover, as you know, we have written you numerous times over the past few months to request clarification and ensure compliance and you have refused to even respond to most of those emails.

As for the deposition date, while this will likely have to be moved since your client has not provided the written discovery he was ordered to provide, until that happens, he is still obligated to appear for his deposition by June 2. To simply state you are not available on the noticed date of June 2 and not offer any alternative dates before the deadline, demonstrates unacceptable gamesmanship and a further intent to not comply with the Court's Orders. Additionally, we noticed your client for an in-person deposition at our New York office and intend to take his deposition there. We also intend to videotape his deposition and will send an amended notice once the date has been set.

Be guided accordingly.
Ron



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From: Bernie Kleinman <attrnylwyr@yahoo.com>
Sent: Friday, May 16, 2025 5:09 PM
To: Mallory Benner <mbenner@grsm.com>; Ronald Giller <rgiller@grsm.com>
Subject: Clearview v Johnson

External Email: STOP! LOOK! THINK! before you engage.

This message came from outside GRSM.

Folks

I have forwarded your Demands and all of the Court filings to my client. He has instructed me to inform you as follows:

"Counter Defendant has already complied with your overly broad ediscovery demands. He will not be providing the Counter Plaintiffs with all of his communications with federal law enforcement. Nor with First Amendment protected sources."

Also, regarding the planned ebt on June 2: this has to be moved, as I am not available that day. Also, I assume this will be virtual, so you can have your Ct Rptr email me the link, which I will forward to Mr. Johnson.

Can you tell me how long you think this will be? I will need to look at my calendar to see when I have the available date/time.

Thank you/have a pleasant/safe weekend.

Bernie Kleinman

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Et cognoscetis veritatem, et veritas liberabit vos